

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JALEN BRADLEY, *et al.*,

Plaintiffs,

Case No. 2:24-cv-03118

v.

Judge Michael H. Watson

CITY OF COLUMBUS, OHIO,
et al.,

Magistrate Judge Kimberly A. Jolson

Defendants.

DEFENDANTS' STATUS REPORT REGARDING DISCOVERY ISSUES

Pursuant to this Court's order of March 13, 2025, Defendants submit this status report regarding the status of discovery in this matter. On March 14, 2025, counsel for Plaintiffs provided signed medical authorizations for both Plaintiffs. That production has resolved one of the two issues presented in Defendants' motion to compel.

To date, Plaintiffs have still not provided a list of the medical providers from whom they have sought treatment since May 6, 2018 (the date the parties have agreed is relevant for purposes of this litigation). (*See* Motion to Compel, p. 15.) Through depositions of third-party witnesses, Defendants have been able to identify certain providers from whom one or both Plaintiffs have allegedly sought medical care at some point in time. Plaintiffs have now provided medical authorizations for those providers. To the extent that the list of providers is not complete, Defendants still ask that Plaintiffs be required to supplement that list with any other providers they have sought care from since May 6, 2018 to the present, or with whom they have future care scheduled. Upon receipt of that list, or a clear representation that no other such providers exist, the motion to compel will be resolved in full.

Respectfully submitted,

/s/ Lee Ann Rabe

David J. Dirisamer (0092125)-Trial Atty.

Lee Ann Rabe (0077170)

Aaron D. Epstein (0063286)

Assistant City Attorneys

CITY OF COLUMBUS, DEPARTMENT OF LAW

ZACH KLEIN, CITY ATTORNEY

77 North Front Street

Columbus, Ohio 43215

(614) 645-7385

(614) 645-6949 (fax)

djdirisamer@columbus.gov

larabe@columbus.gov

adeptstein@columbus.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that, on March 17, 2025, I served the foregoing on all parties of record via the Court's CM/ECF system.

/s/ Lee Ann Rabe

Lee Ann Rabe